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COUNTY OF STANISLAUS,  
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DEPARTMENT, and JEFF DIRKSE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

ESTATE OF XANDER MANN, AMY  
PICKERING, and JUSTIN MANN,

Plaintiffs,

vs.

COUNTY OF STANISLAUS, STANISLAUS  
COUNTY SHERIFF'S DEPARTMENT,  
JEFF DIRKSE, GERARDO ZAZUETA,  
and DOE 1 to 20,

Defendants.

Case No. 1:21-cv-01098-AWI-SKO

**JOINT REQUEST TO MODIFY  
STIPULATED PROTECTIVE ORDER;  
ORDER**

(Doc. 43)

The parties—Plaintiffs Estate of Xander Mann, Amy Pickering, and Justin Mann (collectively, “Plaintiffs”) and Defendants County of Stanislaus, Stanislaus County Sheriff’s Department, and Jeff Dirkse (collectively, “Defendants”)—jointly request the Court to modify the parties’ previously-entered stipulated protective order (ECF No. 28). Specifically, the parties request the stipulated protective order be modified to clarify that the following documents, which were produced as “Confidential,” are no longer covered by the terms of the stipulated protective order:

1. Coroner’s Report (Bates No. StanCo\_2197–StanCo\_2214)
2. X-Rays of Xander Mann (Bates No. StanCo\_0251–StanCo\_0267; StanCo\_2221–StanCo\_2236)
3. Audio Interviews of Valerie Kennedy (Bates No. StanCo\_0268–StanCo\_269)
4. Audio Interviews of Rhiannon Taylor (Bates No. StanCo\_0273–StanCo\_275)
5. Audio Interviews of Hector Delalto (Bates No. StanCo\_0270–StanCo\_271)
6. Audio Interviews of Deputy Zazueta and counsel (Bates No. StanCo\_2240–StanCo\_2241)
7. OIS Photos (Bates No. StanCo\_0276–StanCo\_0941)
8. Investigation Photos (Bates No. StanCo\_1376–StanCo\_1744)
9. DJI Drone Photos (Bates No. StanCo\_0942–StanCo\_1375)
10. Bodycam Videos (Bates No. StanCo\_1745–StanCo\_1767; StanCo\_1769)
11. Bodycam Video (Bates No. StanCo\_1768)
12. Audio Interview of Deputy Zazueta (Bates No. StanCo\_2237–StanCo\_2239)
13. FTO Stanley Bodycam (Bates No. StanCo\_1773)
14. Radio Transmission (Bates No. StanCo\_1770–StanCo\_1771)
15. Sgt. Ruelas Interview (Bates No. StanCo\_2369)
16. Sgt. Hatfield Interview (Bates No. StanCo\_2367)
17. Sgt. Barringer Interview (Bates No. StanCo\_2368)
18. Audio Files, Dispatch (Bates No. StanCo\_1775–StanCo\_1934)
19. Bodycam Videos (Bates No. StanCo\_1936–StanCo\_1952)
20. Report Data Extraction (Bates No. StanCo\_2180–StanCo\_2183)
21. Report Data Extraction (Bates No. StanCo\_2175–StanCo\_2179)

22. Report Interview of Rhiannon Taylor (Bates No. StanCo\_2169–StanCo\_2174)
23. Report of Dalton Gonzalez (Bates No. StanCo\_2157–StanCo\_2168)
24. Report Re: Observations of Hector Delalto at DMC (Bates No. StanCo\_2153–StanCo\_2156)
25. Report Re: Traffic Control (Bates No. StanCo\_2149–StanCo\_2152)
26. ICJIS Reports (Bates No. StanCo\_0001–StanCo\_0249)
27. Memo Re: Pursuit (Bates No. StanCo\_2438–StanCo\_2439)
28. SP21018395 CAD (Bates No. StanCo\_2057–StanCo\_2079)
29. MCS21219084 CAD (Bates No. StanCo\_2080–StanCo\_2084)
30. IA#21-19 MPD (Bates No. StanCo\_2184–StanCo\_2196)
31. Deputy Tovar Interview Drawings (Bates No. StanCo\_2440–StanCo\_2442)
32. Crime Scene Analyst Mapping; OIS Pursuit Route (Bates No. StanCo\_2052–StanCo\_2053)
33. Evidence List (Bates No. StanCo\_2054–StanCo\_2056)
34. Emails Re: Traffic Cams of Pursuit (Bates No. StanCo\_2443–StanCo\_2454)
35. County Claim Investigation (Bates No. StanCo\_2455–StanCo\_2457)
36. CAD Abstract Detail (Bates No. StanCo\_2085–StanCo\_2130)
37. Report S211018395 (Bates No. StanCo\_2131–StanCo\_2148)
38. Citizen’s Complaints against Deputy Zazueta (Bates No. StanCo\_2475–StanCo\_2494)
39. Stanislaus County Sheriff’s Department Report, by case agent Deputy Dalton Gonzalez (Controlled Document Case No: S21018395)
40. Stanislaus County Sheriff’s Department Report, by Field Training Officer Deputy Brandon Stanley (Controlled Document Case No: S21018395)
41. Stanislaus County Sheriff’s Department Report, by Deputy Alex Tovar (Controlled Document Case No: S21018395)
42. Stanislaus County Sheriff’s Department Report, by Deputy Colton Cline (Controlled Document Case No: S21018395)
43. Stanislaus County Sheriff’s Department Report, by Deputy Michael Varni (Controlled

Document Case No: S21018395)

44. Stanislaus County Sheriff's Department Report, by Deputy Andrew Winter (Controlled Document Case No: S21018395)

45. Stanislaus County Sheriff's Department Report, by Deputy Michael Gamez (Controlled Document Case No: S21018395)

46. Stanislaus County Sheriff's Department Report, by Sergeant Kenneth Barringer (Controlled Document Case No: S21018395)

47. Stanislaus County Sheriff's Department Report, by Deputy Caitlin Pfaff (Controlled Document Case No: S21018395)

48. Stanislaus County Sheriff's Department Report, by Deputy Craig Valera (Controlled Document Case No: S21018395)

49. Stanislaus County Sheriff's Department Report, by Deputy Michael Carranza (Controlled Document Case No: S21018395)

50. Stanislaus County Sheriff's Department Report, by Detective Hickman (Controlled Document Case No: S21018395)

51. Stanislaus County Sheriff's Department Report, by Detective Sgt. Joshua Sandoval (Controlled Document Case No: S21018395)

52. Stanislaus County Sheriff's Department Report, by Detective Marissa Silva (Controlled Document Case No: S21018395)

53. Stanislaus County Sheriff's Department Report, by Detective Michael Fisher (Controlled Document Case No: S21018395)

54. Stanislaus County Sheriff's Department Report, by Sergeant Darwin Hatfield (Controlled Document Case No: S21018395)

55. Modesto Police Department Supplemental Report in Case No. MP21012599, Officer Adam Weber

56. Modesto Police Department Supplemental Report in Case No. MP21012599, Officer Conner Jones

57. Modesto Police Department Incident Report in Case No. MP21012599, Officer Jeffrey

Harmon

58. Modesto Police Department Supplemental Report in Case No. MP21012599, Officer Ryan Vander Tuig
59. Stanislaus County Sheriff's Department Report, by Detective Darwin Summerton (Controlled Document Case No: S21018395)
60. Stanislaus County 911 CAD Response Report (SP210183 95) (23 pages), Traffic Pursuit, Deputy Stanley and Deputy Tovar, dispatched 05/18/2021 at 01:50:32
61. Stanislaus County 911 CAD Response Report (MCS21219084) (5 pages), EMSCPR, dispatched 05/18/2021 at 02:12:42
62. Stanislaus County 911 CAD Abstract Report (SP21138007) (46 pages), 245 Assault w/ deadly weapon, primary agent David Hickman, dispatched on 05/18/2021 at 1:50:32
63. Urine and Toxicology Report of Xander Mann (4 Pages)
64. Officer Involved Shooting Photographs (approximately 650 Photos)
65. Investigation Photographs (approximately 350 Photos)
66. Drone Photographs of Scene (approximately 400 Photos)
67. Recordings of Stanislaus County Sheriff's Department Interview of Hector Del Alto (2 files)
68. Recording of Stanislaus County Sheriff's Department Interview of Loralye Vann provided by the Stanislaus County Sheriff's Department
69. Recordings of Stanislaus County Sheriff's Department Interview of Rihannon Taylor (3 files)
70. Recordings of Stanislaus County Sheriff's Department Interview of Valerie Kennedy (2 files)
71. Body Camera Videos from Modesto Police Officers
72. Body Camera Video of Stanislaus County Sheriff's deputies
73. Stanislaus County Sheriff's Department Officer Training, PIT Course Training Roster, January 6, 2021
74. Stanislaus County Sheriff's Department Advanced Officer Training, Sheriffs Tactical

Operations Program ('S.T.O.P.'), PIT Course Training Roster ("STOP"), February 25, 2021

75. Stanislaus County Sheriff's Department Advanced Officer Training, Sheriffs Tactical Operations Program ("S.T.O.P."), Firearms Training Roster, February 24, 2021

IT IS SO STIPULATED.

Dated: May 27, 2022

Respectfully Submitted,  
LAW OFFICE OF MARK E. MERIN

*/s/ Mark E. Merin*

By: \_\_\_\_\_  
Mark E. Merin  
Paul H. Masuhara  
Attorneys for Plaintiffs  
ESTATE OF XANDER MANN,  
AMY PICKERING, and JUSTIN MANN

Dated: May 27, 2022

Respectfully Submitted,  
RIVERA HEWITT PAUL LLP

*/s/ Jill B. Nathan*  
(as authorized on May 27, 2022)

By: \_\_\_\_\_  
Shanan L. Hewitt  
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Wendy Motooka  
Attorneys for Defendants  
COUNTY OF STANISLAUS,  
STANISLAUS COUNTY SHERIFF'S  
DEPARTMENT, and JEFF DIRKSE

**ORDER**

GOOD CAUSE APPEARING, the parties' foregoing request (Doc. 43) is GRANTED.

The previously entered stipulated protective order (Doc. 28) is hereby MODIFIED, where the materials identified above are no longer "Confidential" under the terms of the stipulated protective order and Rule 26(c) of the Federal Rules of Civil Procedure.

IT IS SO ORDERED.

Dated: May 31, 2022

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE